



Mary-Ann Warmerdam  
Director

Arnold Schwarzenegger  
Governor

Dear Registrant:

Extension of Time to Respond to VOC Reformulation Reevaluation of  
Certain Liquid Formulation Agricultural and Commercial Structural-Use Pesticide Products

Pursuant to Article 8, Subchapter 1, Chapter 2, Division 6 of Title 3 of the California Code of Regulations, the Department of Pesticide Regulation (DPR) placed certain of your agricultural and commercial structural pesticide products (Attachment A) into reevaluation on May 31, 2005.

Under this reevaluation, you were required to choose one of three options and provide the required information to DPR by August 31, 2005.

A few registrants submitted reformulation timelines, exemption requests, or explanations as to why a given pesticide product could not be reformulated. However, a number of registrants requested an extension of time. Certain registrants stated that they are unable to discern which of the products included in the reevaluation are subject to reformulation because they have not yet run thermogravimetric analysis (TGA) studies on these products to determine if the product's current VOC emission potential exceeds 20 percent.

In response, DPR has decided to extend the deadline for responding to the VOC reformulation reevaluation data requirements.

If you have not yet complied with the reevaluation requirements, you are required to comply by **March 1, 2006** by choosing one of the following three options for each of your products:

- (1) Submit a written commitment to reformulate the pesticide product to a VOC emission level of **20 percent or less**, including information on how the product will be reformulated, a detailed timeline for accomplishing each task, and a schedule for progress reports. The timeline must include proposed dates for submission of status reports, reformulation, submission to U.S. EPA, and submission to DPR. Once U.S. EPA has accepted the formulation change, the amended product must be submitted to DPR for approval, along with the results of a new TGA study.

If the formulation change is substantial, you may be required to submit new acute toxicity, efficacy, or phytotoxicity data to DPR. The reformulation process must be completed within four years of DPR's acceptance of your commitment.

- (2) Submit a request for exemption if your product does not meet the established reevaluation criteria. Supporting documentation must be included with the request for exemption; **or**



- (3) Submit a detailed explanation as to why the pesticide product cannot be reformulated, including why reformulation is not chemically feasible or proof that reformulation would be contrary to VOC reduction and pest management goals and identify an alternate VOC reduction option(s) for your product.

Mailing Address

Please address all correspondence regarding this reevaluation as follows:

VOC Mitigation Reevaluation  
Attn: Ann Prichard  
Department of Pesticide Regulation  
1001 I Street, P.O. Box 4015  
Sacramento, California 95812-4015

If you have questions regarding the reevaluation process, please contact Ms. Ann Prichard, Senior Environmental Research Scientist, Pesticide Registration branch by e-mail at <aprichard@cdpr.ca.gov> or by telephone at (916) 324-3931. For information regarding mitigation measures, please contact Mr. Randy Segawa, Senior Environmental Research Scientist, Environmental Monitoring Branch, by e-mail at <rsegawa@cdpr.ca.gov> or by telephone at (916) 324-4137.

Failure of a registrant to comply with the requirements of this reevaluation may subject that registrant's product(s) to cancellation pursuant to Food and Agricultural Code section 12825(h).

Sincerely,

*Original signed by Barry Cortez*

11-29-05

Barry Cortez, Chief  
Pesticide Registration Branch  
(916) 445-4377

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Date

Attachment A

cc: Ms. Ann Prichard  
Mr. Randy Segawa